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Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re
JAMIE LYNN GALLIAN,
Debtor.

Case No. 8:21-bk-11710-ES

Chapter 7

**TRUSTEE’S RESPONSE TO THE
MOTION FOR RELIEF FROM THE
AUTOMATIC STAY FILED BY HOUSER
BROS. CO. DBA RANCHO DEL REY
MOBILE HOME ESTATES**

Date: September 27, 2023
Time: 10:00 a.m.
Place: Courtroom 5C
411 W. Fourth Street
Santa Ana, California 92701

Jeffrey I. Golden, as the Chapter 7 Trustee (the “Trustee”) for the bankruptcy estate of Jamie Lynn Gallian (the “Debtor”) hereby responds to the Motion for Relief from the Automatic Stay (Unlawful Detainer) filed by Houser Bros. Co. dba Rancho Del Rey Mobile Home Estates (“Houser”) (*docket no. 375*) (the “Motion”).

The Motion seeks entry of an order confirming that there is no automatic stay in effect and that Houser may pursue entry of judgment in *Houser Bros. Co. dba Rancho Del Rey Mobile Home Estates v. Jamie Gallian, et al.*, OCSC Case No. 30-2023-01316057-CL-UD-CJC (“2023 Forcible Entry Action”) and collection of its prepetition claim against the Debtor. In the alternative, the Motion seeks relief from stay (or entry of an amended order) clarifying that Houser may proceed to

1 judgment in the 2023 Forcible Entry Action with respect to any monetary claim Houser has against
2 the Debtor for amounts attributable to the period before the Bankruptcy Case was filed.

3 The Trustee does not oppose granting the requested relief provided that Houser is not
4 permitted to enforce any judgment against property of the Debtor's bankruptcy estate.

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6 DATED: September 13, 2023

DANNING, GILL, ISRAEL & KRASNOFF, LLP

7
8 By: /s/ Eric P. Israel

9 ERIC P. ISRAEL

10 Attorneys for Jeffrey I. Golden,
11 Chapter 7 Trustee
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1901 Avenue of the Stars, Suite 450, Los Angeles, CA 90067-6006.

A true and correct copy of the foregoing document entitled (*specify*): TRUSTEE'S RESPONSE TO THE MOTION FOR RELIEF FROM THE AUTOMATIC STAY FILED BY Houser Bros. Co. DBA Rancho del Rey Mobile Home Estates will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On September 13, 2023 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL: On September 13, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by causing to be placed a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 13, 2023

Date

Beverly Lew

Printed Name

/s/ Beverly Lew

Signature

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)

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United States Trustee (SA)
ustpreion16.sa.ecf@usdoj.gov

2. SERVED BY U.S. MAIL

Debtor
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Huntington Beach, CA 92649

The Honorable Erithe Smith
U.S. Bankruptcy Court
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